

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., <u>et al.</u>	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
Debtors.	)	
	)	Re: Docket No. 9315

**CERTIFICATION OF COUNSEL  
REGARDING THE DEBTORS' PROPOSED SCHEDULING ORDER REGARDING  
DEBTORS' FIFTEENTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)**

1. At the October 24, 2005 hearing on the Debtors' Fifteenth Omnibus Objection to Claims [Docket No. 9315], the Court requested that certain parties submit an Order providing a proposed schedule for briefing and hearing of matters with respect to the Fifteenth Omnibus Objection.
2. Despite their best efforts, the Debtors, the Property Damage Committee and Speights and Runyan have been unable to reach an agreement regarding the Scheduling Order Regarding Debtors' Fifteenth Omnibus Objection to Claims (Substantive).
3. Accordingly, the Debtors submit the attached their proposed *Scheduling Order Regarding Debtors' Fifteenth Omnibus Objection to Claims (Substantive)* (the "Order") attached hereto as Exhibit A.
4. The Property Damage Committee and Speights and Runyan have not consented to the Order.

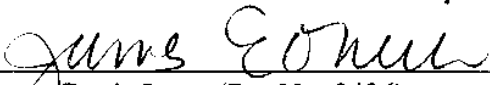
5. The Debtors will present the Order for the Court's consideration at the Omnibus Hearing on November 14, 2005.

Dated: November 4, 2005

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-and-

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